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July 18, 2025

By ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

Re: Hernandez v. City of New York, et al.
No. 25-CV-01867 (RA)

Dear Judge Abrams:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York and counsel for the defendants City of New York and Jessica Tisch in the above-referenced matter. I write to respectfully request an extension of time until August 15, 2025, for Defendants City and Tisch to respond to Plaintiff's complaint. This is Defendants City and Tisch's second request to extend the response deadline. Defendants' missed the first extended deadline as their response was due on July 15, 2025. For the reasons set forth below, Defendants City and Tisch make this application for an extension of time *nunc pro tunc*. I contacted Plaintiff's counsel to request his consent earlier today and have not yet received a response.¹

Since the Court granted the first extension request, I went out on leave from June 18th to June 27 to attend to one of my elderly parents who lives alone out of state and needed assistance following an outpatient procedure. I returned to New York and work on June 30th. I fell ill and subsequently fell behind on my deadlines. I apologize for missing the response deadline in this case.

¹ While not yet appearing on behalf of the individually named defendants Edward A. Caban and Amy J. Litwin, it is respectfully requested that the Court extend the time for Defendants Caban and Litwin to respond to the complaint *sua sponte* until August 15, 2025, so that their defenses are not jeopardized while representational issues are being finalized.

I am requesting a 30-day extension as I have several competing deadlines. Currently, I have discovery responses due on July 18th in Adjei v. NYC Environmental Protection Inc., et al. (S.D.N.Y. 24-cv-08460 (JAV)), a reply due on July 23 in Burnett v. City of New York, et al. (S.D.N.Y. 24-cv-08725 (RA)(SLC)); an opposition to a motion for class certification due on July 30 in Harris v. City of New York, (Index No. 156195/2024); a reply in further support of a motion for summary judgment due on July 31st in Nnebe v. New York City DOE, (S.D.N.Y. No. 22-cv-03860 (VAC) (SLC)); and discovery responses due by August 10th in Greenridge v. City of New York, et al. (Index No. 155062/2022).

I thank the Court for its consideration of this request and attention to this matter.

Respectfully submitted,

/s/ Dominique Anglade

Dominique Anglade

Assistant Corporation Counsel

cc: Eric Sanders, Esq. (via ECF)
The Sanders Law Firm, P.C..
Attorneys for Plaintiff

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams

July 21, 2025